

From: Aviles, Jesse
Sent: Monday, February 08, 2016 2:29 PM
To: 'Samuel Laguna'; Terry Taylor (External)
Cc: 'Josephine Acevedo Esquilin'
Subject: RE: RFI Report Schedule

These are the comments to the SLERA

The Screening Level Ecological Risk Assessment report is prepared following the first two steps of the USEPA's eight step process for conducting ecological risk assessments as described in the Ecological Risk Assessment Guidance for Superfund (ERAGS) document.

The media of concern that were evaluated include surface soil, subsurface soil, surface water, and groundwater; of which only subsurface soil and groundwater were previously sampled. Surface soil and surface water contaminant concentrations were estimated based on air dispersion and deposition modeling results from the 2006 TAPI incinerator human health risk assessment.

As stated in the report, the only primary release mechanisms for COPECs to surface water and surface soil at the TAPI facility is the transport of an accidental spill or release of waste directly to the drainage swale or the ground surface. In order to determine if accidental spills or releases may have occurred in the drainage swale or the surface soil of the 20 acres of the undeveloped area at the facility, both surface water and surface soil samples need to be collected.

Surface water and sediment samples should be taken upstream, adjacent to the facility, and downstream in the drainage swale. Surface soil samples from a shallow depth (0 – 6 inches) should be collected in the undeveloped area both adjacent to and at a distance from the facility to determine if contaminants may have migrated off-site from the facility. Direct sampling of these media will absolutely eliminate the potential uncertainty of using estimated modeling results from the incinerator risk assessment.

In order to determine if incinerator emissions are causing potential risks to higher trophic level ecological receptors such as birds, mammals, and fish, the August 1999 Screening Level Ecological Risk Assessment Protocol for Hazardous Waste Combustion Facilities guidance should be consulted and used to calculate potential ecological risks.

From: Samuel Laguna [mailto:Samuel.Laguna@tevapharm.com]
Sent: Wednesday, December 30, 2015 11:46
To: Terry Taylor (External) <TTaylor@amaiconsult.com>
Cc: Aviles, Jesse <Aviles.Jesse@epa.gov>
Subject: RE: RFI Report Schedule

Terry:

Saludos!

Let's hold this for now until we receive a communication from Jesse Avilez. He inspected our facility last week and told us that the CEPD wanted two additional considerations (including an air modeling).

Have a "Happy New Year!"

Samuel



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From: Terry Taylor (External) [mailto:TTaylor@amaiconsult.com]
Sent: Wednesday, December 30, 2015 11:17 AM
To: Samuel Laguna
Subject: RFI Report Schedule

Samuel,

I will be sending you the draft RFI report next week. It will be reviewed internally this week and then sent to you next week. Is that acceptable to you?

Happy Holidays,
Terry

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